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December 8, 1999

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Sir:

The following are formal comments to the Nuclear Regulatory Commission supporting the proposed rule published in the Federal Register on December 1, 1999 related to working hour limits for employees at nuclear power plants

The Federal government imposes working hour limits on truck drivers and airline pilots to protect the public from fatigued workers. It is time for the Federal government to impose working hour limits on employees at nuclear power plants that can be enforced whether plants are running or not.

I gather that the NRC introduced guidelines in 1982 limiting some workers at nuclear power plants to 16 hours per day and 72 hours per week, but that this only applies when the plant is actually running. Thus, plant operators can require workers to work 12 and 16 hour days for weeks on end during refueling outages.

It makes little sense to have fatigued workers repairing, inspecting, and testing safety equipment even if the nuclear power plant is shut down. They could so easily make a mistake or overlook some detail that would not be readily apparent, but which could cause a major problem when the plant is operating. The purpose here is to protect the public and the environment from a nuclear power plant accident. The consequences of errors and misjudgments is too awesome to readily contemplate.

Thank you very much.
Sincerely,

Patricia H. Seffens
Patricia H. Seffens



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